

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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DANA MANZA, individually and on  
behalf of all other similarly situated,

Plaintiff,

Case No.: 24-CV-690-amb

v.

PESI, INC.,

Defendant.

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**JOINT MOTION FOR PROTECTIVE ORDER**

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Plaintiff Dana Manza (“Plaintiff”) and Defendant PESI, Inc., (“Defendant”) (collectively the “Parties”), respectfully request that the Court, pursuant to Rule 26(c)(1) of the Federal Rules of Civil Procedure, grant their instant Joint Motion and enter the Agreed Protective Order attached hereto as Exhibit A to govern and/or limit the dissemination of discovery conducted in this case, including, but not limited to, the production and/or exchange of documents and information. In support of their instant motion, the Parties state as follows:

1. This is a putative class action in which Plaintiff alleges Defendant violated the Video Privacy Protection Act (“VPPA”), 18 U.S.C. § 2710, *et seq.*

2. The Parties have met and conferred and agree that the attached Protective Order should be entered to govern and/or limit the dissemination of discovery conducted in this case, including, but not limited to, the production and/or exchange of documents and information, which likely will involve the exchange of sensitive personal, business, financial, and/or commercial information.

3. Rule 26(c)(1)(G) of the Federal Rules of Civil Procedure provides that “[t]he court may, for good cause, issue an order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense, including . . . requiring that a trade secret or other confidential research, development, or commercial information not be revealed or be revealed only in a specified way.” Fed. R. Civ. P. 26 (c)(1)(G).

4. Here, there is good cause for entry of the attached Protective Order to maintain the

confidentiality of sensitive personal, business, financial, and/or commercial information, while at the same time providing the parties with sufficient access to such information.

WHEREFORE, the Parties respectfully request that the Court grant their instant motion and enter the Protective Order attached as Exhibit A.

Dated: March 27, 2025.

Respectfully submitted,

**HINSHAW & CULBERTSON, LLP**  
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Electronically Signed by Brett B. Larsen

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